

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DAVID RAMIREZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

MILITARY ADVANTAGE, INC. d/b/a  
MILITARY.COM,

Defendant.

Case No. 1:22-cv-10892-WBY

Hon. William B. Young

**JOINT STATEMENT CONTAINING PROPOSED PRETRIAL SCHEDULE**

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1(d), counsel for Plaintiff David Ramirez (“Plaintiff”), and counsel for Defendant, Military Advantage, Inc. d/b/a Military.com (“Defendant”) have conferred and hereby submit the following joint statement to the Court.

The Parties will also exchange initial disclosures under Rule 26(a)(1) on or before March 3, 2023.

The Parties have agreed to submit this matter to private mediation within the next 45-60 days and are in the process of scheduling the same. The Parties will update the Court once they have selected a mediator and a date. In order to preserve the status quo and the Parties’ resources, the Parties jointly request that the Court extend all deadlines by 60 days to allow them to focus their efforts exclusively on potential resolution at this time. The Parties will submit a joint status report within five days of the mediation to update the Court on the status of their negotiations, including whether a new discovery schedule should be set.

Dated: February 13, 2023

Respectfully Submitted,

By: /s/ Philip L. Fraietta  
Philip L. Fraietta

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*Attorneys for Plaintiff*

Dated: February 13, 2023

Respectfully submitted,

By: /s/ Kristine R. Argentine  
Kristine R. Argentine

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**CERTIFICATE OF SERVICE**

I, Philip L. Fraietta, hereby certify that on February 13, 2023, a true and accurate copy of the foregoing document was filed electronically with the clerk of court via CM/ECF, which will then send a notification of such filing to all counsel of record and those who have registered for notice.

/s/ Philip L. Fraietta

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